UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WPIX, INC., WNET.ORG, AMERICAN BROADCASTING COMPANIES, INC., DISNEY ENTERPRISES, INC., CBS BROADCASTING INC., CBS STUDIOS INC., THE CW TELEVISION STATIONS INC., NBC UNIVERSAL, INC., NBC STUDIOS, INC., UNIVERSAL NETWORK TELEVISION, LLC, TELEMUNDO NETOWRK GROUP LLC, NBC TELEMUNDO LICENSE COMPANY, OFFICE OF THE COMMISSIONER OF BASEBALL, MLB ADVANCED MEDIA, L.P., COX MEDIA GROUP, INC., FISHER BROADCASTING-SEATTLE TV, L.L.C., TWENTIETH CENTURY FOX FILM CORPORATION, FOX TELEVISION STATIONS, INC., TRIBUNE TELEVISION HOLDINGS, INC., TRIBUNE TELEVISION NORTHWEST, INC., UNIVISION TELEVISION GROUP, INC., THE UNIVISION NETWORK LIMITED PARTNERSHIP, TELEFUTURA NETWORK, WGBH EDUCATIONAL FOUNDATION, THIRTEEN, and PUBLIC BROADCASTING SERVICE,

Plaintiffs,

- against -

IVI, INC. and TODD WEAVER,

Defendants.

Docket No.: 10 Civ. 7415 (NRB)

NOTICE OF CROSS-MOTION TO TRANSFER PURSUANT TO 28 USC 1404 AND TO DIMISS FOR LACK OF PERSONAL JURISDICTION

(Oral Argument Requested)

PLEASE TAKE NOTICE that upon the declaration of Todd Weaver and the Exhibits annexed thereto and the Memorandum of Law submitted in support of Defendants' motion the Defendants ivi, INC. and Todd Weaver, by and through their attorneys, Nissenbaum Law Group, LLC and Black Lowe & Graham, PLLC, will move this Court before the Honorable Naomi Reice Buchwald, United States District Court Judge, at the United States Courthouse for the

Southern District of New York, located at 500 Pearl Street, New York, New York, where counsel may be heard for an Order:

1. Pursuant to 28 U.S.C. § 1404, transferring the within matter to the United States District Court, Western District of Washington;

2. Dismissing the complaint against Defendant Todd Weaver on the grounds that the court lacks personal jurisdiction over this Defendant; and,

3. Granting such other, further and different relief as to this Court seems just, equitable and proper under the circumstances.

PLEASE TAKE FURTHER NOTICE that in accordance with Local Rule 6.1(b), answering papers, if any, are to be served within fourteen (14) business days after service of these moving papers.

PLEASE TAKE FURTHER NOTICE that Defendants request oral argument.

Dated: October 19, 2010
Union, New Jersey

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